JOSEPH P. RUSSONIELLO (CSBN 44332) 1 United States Attorney THOMAS MOORE (ASBN 4305-078T) 2 Assistant United States Attorney 3 Chief, Tax Division DAVID L. DENIER (CSBN 95024) Assistant United States Attorney 4 9th Floor Federal Building 450 Golden Gate Avenue, Box 36055 5 San Francisco, California 94102 6 Telephone: (415) 436-7017 (415) 436-6748 Fax: 7 Attorneys for the United States of America 8 IN THE UNITED STATES DISTRICT COURT FOR THE 9 NORTHERN DISTRICT OF CALIFORNIA 10 SAN FRANCISCO DIVISION 11 UNITED STATES OF AMERICA and No. C-07-05226-SI 12 JAY COCHRAN, Revenue Agent, Petitioners, 13 APPLICATION FOR SECOND AMENDED ORDER TO SHOW CAUSE 14 RE ENFORCEMENT OF INTERNAL REVENUE SERVICE SUMMONS SANDRA WILLIAMS, 15 16 Respondent. 17 On October 12, 2007, petitioners filed a Verified Petition to Enforce Internal Revenue Summons. On October 15, 2007, the Court issued an Order to Show Cause Re Enforcement of 18 Internal Revenue Service Summons which ordered respondent Sandra Williams to appear before 19 20 the Court on December 14, 2007, at 9:00 a.m. and then and there show cause, if any, why she 21 should not be compelled to appear and provide documents and testimony as required and set forth in the Verified Petition. The Court further ordered that the Order to Show Cause, together 22 with a copy of the Verified Petition, be served upon respondent in accordance with the Fed. R. 23 24 Civ. P. Rule 4 at least thirty-five (35) days before the return date. 25 Petitioners were unable to serve upon respondent the Order to Show Cause issued by the 26 Court on October 25, 2007, and were again unsuccessful in effecting service of the Amended 27 Order to Show Cause Re Enforcement of Internal Revenue Summons. Petitioners, therefore, request that the Court issue a Second Amended Order to Show Cause setting the return date for 28

1	April 11, 2008 or as soon thereafter as is convenient for the Court.
2	Respectfully submitted,
3	JOSEPH P. RUSSONIELLO United States Attorney
4	
5	/s/ David L. Denier DAVID L. DENIER Assistant United States Attorney Tax Division
6	Assistant United States Attorney Tax Division
7	
8	
9	
10	
11	
12 13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	